

# **Exhibit E**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A  
CENTURION PROFESSIONALS;  
MANAGEMENT & TRAINING CORPORATION  
JESSE WILLIAMS, INDIVIDUALLY;  
AND JOHN DOES 1-9

DEFENDANTS

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ZOOM DEPOSITION OF JESSE WILLIAMS

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Taken at the Instance of the Plaintiff  
With All Parties Appearing by Zoom Videoconferencing  
On August 3, 2020  
At 12:31 p.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR  
CSR NO. 1144

1 JESSE WILLIAMS,  
2 having first been duly sworn, was examined and  
3 testified as follows:

4 EXAMINATION

5 BY MR. WAIDE:

6 Q. Sir, would you state your name, please.

7 A. Jesse Williams.

8 Q. What city do you live in, Mr. Williams?

9 A. Memphis, Tennessee.

10 Q. Have you ever lived in Mississippi?

11 A. No, sir.

12 Q. Where do you consider your home to be?

13 A. Florida.

14 Q. Is that where you were born?

15 A. No, sir.

16 Q. What state were you born in?

17 A. Ohio.

18 Q. Where are you employed?

19 A. MTC.

20 Q. When did you start doing corrections  
21 work? What year?

22 A. Let's see. 1989.

23 Q. Other than corrections work, have you  
24 ever had any law enforcement experience?

25 A. Just corrections.

1       you information, what information did  
2       Mr. Williams furnish to you? what did  
3       Mr. Williams tell you that she had done wrong?

4       A.    We had dialogue about information  
5       pertaining to the operation of the Marshall  
6       County Correctional Facility being given to  
7       individuals outside of the facility, if you  
8       will, and had an understanding that that  
9       information was being given to those individuals  
10      from individuals in the medical department from  
11      Centurion.

12      Q.    Here's my question: what is it that  
13      Mr. Williams told you -- I don't need, you know,  
14      "We had discussions," but just tell me what  
15      Mr. Williams told you that had been done wrong.  
16      What did he tell you that Dr. Woods has done  
17      that's wrong?

18      A.    He stated to me that information  
19      pertaining to, again, institutional operations  
20      in terms of security numbers, various things  
21      within the institution that is, again, in line  
22      with prison operations, was being shared with  
23      individuals outside of our facility.

24      Q.    When did Mr. Williams tell you that?

25      A.    The exact date I do not remember.

1 in the manner in which it did.

2 Q. Well, what manner do you think it ought  
3 to go outside the facility?

4 A. It's a way, the chain of command that  
5 should have been followed in my mind.

6 Q. All right. Had you not in the past had  
7 any conversations with Dr. Woods about y'all's  
8 shortage of security and not being able to get  
9 prisoners over to see her? Had you not had  
10 problems with her about that?

11 MR. LONG-DANIELS: Objection to form.

12 BY MR. WAIDE:

13 Q. Let me start that over. Had Dr. Woods  
14 not told you that she was concerned about not  
15 getting the prisoners over to see her for  
16 medical care? Had she not told you that?

17 A. She's voiced that opinion before, yes.

18 Q. So that's what you had a problem with.

19 A. No, sir, not at all.

20 Q. Well, is that not the same thing she  
21 told the state -- that you believe she told the  
22 state legislator?

23 A. That's part of some of the things that  
24 I believe she said to the state legislator.

25 Q. But you don't have a problem with her

1       telling the state legislator, then, about the  
2       fact that y'all had inadequate security up there  
3       and, as a result, y'all weren't getting  
4       prisoners over for medical attention. You  
5       didn't have a problem with that?

6           A.    I have a problem with that type of  
7       vernacular of prison operations being discussed  
8       outside the facility.

9           Q.    In other words, you don't think the  
10      state legislator should be able to learn that a  
11      doctor up there who's providing medical  
12      treatment for prisoners is concerned about the  
13      lack of security so that she could get the  
14      prisoners over to see her? You don't think she  
15      should be able to tell the legislator about  
16      that?

17           MR. PEEPLES: Object to the form.

18           MR. LONG-DANIELS: Form.

19           MR. PEEPLES: You can answer.

20           A.    I have -- again, I have no problem with  
21      the legislator learning and knowing any of that.  
22      Again, my problem comes down to how the  
23      information was given because it's a -- it's  
24      problematic as you deal with prison operations.

1 BY MR. WAIDE:

2 Q. I need to know specifically what you're  
3 talking about. How should she have told the  
4 legislator about it?

5 A. She has a chain of command she could  
6 have followed through the company which she  
7 works with.

8 Q. All right. So in answer to the  
9 question, she should not have directly talked to  
10 the legislator?

11 A. Your question was how should she have  
12 done it. My answer is she should have gone  
13 through her chain of command.

14 Q. Well, the legislator was not in her  
15 chain of command. Correct?

16 A. Not to my knowledge, she is not.

17 Q. Therefore, she should not have talked  
18 to a member of the legislature.

19 A. That's her choice. I'm just telling  
20 you how I feel and the way I viewed it.

21 Q. And that's the reason you took her  
22 security clearance away. Correct?

23 A. The security -- the authorization for  
24 entrance was pulled because of prison operations  
25 and information being given to folks outside of

1 the facility.

2 Q. Who did she give it to other than the  
3 legislator in your opinion?

4 A. That's all the information that I have.

5 Q. All right. So, then, it's your opinion  
6 that she should not have talked to the  
7 legislator.

8 A. No, sir --

9 MR. LONG-DANIELS: Objection to form.

10 A. -- that's not what I'm saying.

11 BY MR. WAIDE:

12 Q. Sir?

13 A. No, sir, that's not what --

14 Q. Your counsel was saying something. I  
15 didn't hear what your counsel said.

16 MR. PEEPLES: I didn't say anything.

17 David objected to the form of your  
18 question. I didn't say anything. He  
19 looked at me to ask if he could answer. I  
20 told him to go ahead.

21 A. No, sir. My problem is just, again,  
22 prison operation information being distributed  
23 outside of the institution.

24 BY MR. WAIDE:

25 Q. Well, specifically, all you've told us



1                   It was your decision to revoke  
2           Ms. Woods' access to the security compound.  
3           Correct?

4           A.     Yes, sir.

5           Q.     And that was your decision and yours  
6           alone.   Correct?

7           A.     It was, indeed, my decision; and I did  
8           confer through my chain of command with my  
9           regional vice president, and I also had --

10          Q.     Go ahead.   I'm sorry.

11          A.     I'm sorry.   I also had dialogue with  
12          Centurion folks, being Travis Day and April  
13          Meggs, before making the final decision.   And,  
14          again, not to say is it okay with them, to  
15          inform them of the direction in which I was  
16          going.

17          Q.     In other words, you decided, and then  
18          you told them.   Correct?

19                   MR. WAIDE:   Object to the form as  
20           leading.

21                   MR. LONG-DANIELS:   I'm allowed to  
22           lead.   He's not my witness.

23           BY MR. LONG-DANIELS:

24          Q.     Warden, you made the decision, and you  
25          told them of your decision.   Correct?

1 Q. Your job is not just violence, though,  
2 of inmates; it's violence, security of your  
3 officers and the public. Right?

4 A. Very much so, sir.

5 Q. You guys have pretty violent people in  
6 your prison?

7 A. Yes, sir.

8 MR. WAIDE: Object to the form. It's  
9 leading.

10 BY MR. LONG-DANIELS:

11 Q. Tell us the most violent level of  
12 prisoner that you have there.

13 A. Well, I have zero inmate at my facility  
14 that are there for jaywalking. I can assure you  
15 of such. Some of the most violent inmates that  
16 I have are what we call "long-term segregation  
17 offenders" or maximum security offenders. Some  
18 of these offenders are housed in Mississippi  
19 Department of Corrections at Marshall for  
20 violent crimes -- murder, rape, ag murder,  
21 burglary -- but they are classified as long-term  
22 segregation offenders because, while they've  
23 been incarcerated, they've seriously assaulted  
24 staff or other offenders. That has raised their  
25 security level from medium or close to long-term

1 A. That's correct, sir.

2 Q. Was that Inmate Kelly that you were  
3 referring to earlier --

4 A. Yes, sir.

5 Q. -- that you were doing the  
6 investigation on?

7 A. Yes, sir. I asked Dr. Woods questions;  
8 I asked my investigator questions. I looked at  
9 video. During the use of force segment of what  
10 we do, every staff member that was involved with  
11 the use of force would be interviewed and have  
12 to give a written document of their accounts of  
13 what happened as well.

14 Q. And if it's true, that the inmate had  
15 choked your security person to the point that  
16 she was unconscious --

17 A. Yes, sir.

18 Q. -- and then tried to rape her?

19 A. Yes, sir.

20 Q. You have dangerous people in your  
21 facility. No dispute about that?

22 A. Yeah, I have some -- I have some guys  
23 that are very dangerous.

24 Q. Now let's go to Exhibit 11 and talk  
25 about that exhibit for a moment. If you will

1 decision to revoke the access on your own using  
2 what God has given you between your ears?

3 A. That would be correct, sir.

4 Q. Nobody from Centurion told you to  
5 revoke her access, did they?

6 A. No, sir, they did not.

7 Q. In fact, the folks from Centurion sort  
8 of asked you to reconsider if you'll do it.  
9 Right?

10 A. I do not remember that conversation  
11 with Centurion in terms of reconsidering  
12 bringing her -- or revoking the authorization  
13 for entrance.

14 Q. Clearly, you didn't revoke her security  
15 clearance because she refused to do something  
16 illegal with respect to the patient's health?

17 A. No. Her authorization was not pulled  
18 for that at all.

19 Q. It did not have a thing to do with any  
20 reservation on her providing care to patients,  
21 did it?

22 A. That would be correct, sir.

23 Q. This all stemmed from her not following  
24 the chain of command as you articulated to  
25 Mr. Waide?

1           A.    Yes, sir.   Just our prison operations  
2   being violated by her to outside sources.

3           Q.    And you say "prison operations," but  
4   what you're really saying in everyday layman  
5   terms is you don't want somebody telling --  
6   anybody in the prison telling folks outside  
7   what's going on with inmates because that could  
8   affect security.   Right?

9           MR. WAIDE:   Object to the form as  
10   leading.

11          A.    Yes, sir.

12   BY MR. LONG-DANIELS:

13          Q.    I don't care if his name is state  
14   representative or state senator or the governor,  
15   if you start telling folks about what's going on  
16   in the prison, it could impact the security of  
17   everybody.   Right?

18          A.    Very much so.

19               MR. LONG-DANIELS:   That's all the --  
20   that's all the questions I've got for you.  
21   Thank you so much for participating.

22               THE WITNESS:   Yes, sir.

23               MR. WAIDE:   I have some -- I have  
24   some follow-up questions unless counsel --  
25   Tim, do you have any questions?